



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



AUG 17 2015

Mr. Anthony Falbo
MM Tulare Energy LLC
5087 Junction Road
Lockport, NY 14094

Re: Notice of Minor Title V Permit Modification
District Facility # S-2890
Project # S-1153056

Dear Mr. Falbo:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit(s) to Operate (PTOs) S-2890-1 and S-2890-2 of the facility's current Title V operating permit. The modification is to remove a non-applicable condition that was incorrectly placed on the permit during a previous project.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-2890-1-9 and S-2890-2-9, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1153056

Engineer: Dan Klevann
Date: July 20, 2015

Facility Number: S-2890
Facility Name: MM Tulare Energy LLC
Mailing Address: 5087 Junction Road
Lockport, NY 14094

Contact Name: Anthony Falbo
Phone: 716-439-1004

Responsible Official: Anthony Falbo
Title: Vice President

I. PROPOSAL

MM Tulare Energy LLC (MMT) is a facility with two landfill gas fired engines located at a municipal solid waste landfill (S-3729). MMT is proposing a Minor Modification to their Title V Permit. The modification is to remove the non-applicable District Rule 4642, Solid Waste Disposal Sites, destruction efficiency requirement from the engines. This condition was incorrectly placed on the permit during a previous project. The landfill is subject to the NSPS WWW requirements. Therefore, the landfill and the control equipment associated with it is not subject to the District Rule 4642 per the exemption section of Rule 4642. Therefore the engines should not have any Rule 4642 requirements.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for the proposed revisions. No new Authority to Construct permit is associated with this Minor Modification.

II. FACILITY LOCATION

MMT is located at the Visalia Landfill 33466 Road 80 Visalia, CA.

III. EQUIPMENT DESCRIPTION

S-2890-1-9: 1150 HP LEAN BURN CATERPILLAR MODEL G3516TA LEAN-BURN LANDFILL GAS-FIRED IC ENGINE SERVED BY A 55 GALLON DRUM WITH ACTIVATED CARBON (SHARED WITH PERMIT UNIT S-2890-2) USED AS A CRANKCASE EMISSIONS CONTROL DEVICE POWERING AN ELECTRICAL GENERATOR

S-2890-2-9: 1150 HP LEAN BURN CATERPILLAR MODEL G3516TA LEAN-BURN LANDFILL GAS-FIRED IC ENGINE SERVED BY A 55 GALLON DRUM WITH ACTIVATED CARBON (SHARED WITH PERMIT UNIT S-2890-2) USED AS A CRANKCASE EMISSIONS CONTROL DEVICE POWERING AN ELECTRICAL GENERATOR

IV. SCOPE OF EPA AND PUBLIC REVIEW

This correction and change to the Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

S-2890-1 and S-2890-2:

Condition 14 on both permits will be removed. The VOC destruction efficiency requirement of District Rule 4642 is not applicable because the landfill is subject to the requirements of NSPS WWW. The engines must continue to meet District Rule 4702 requirements.

14. IC engine VOC destruction/treatment efficiency shall be at least 98% by weight or reduce the VOC concentration to 20 ppmv or less (as hexane) @ 3% O₂. [District Rule 4642]

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permits
- B. Previous Title V Operating Permit
- C. Application
- D. Compliance Certification Form

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2890-1-9

EXPIRATION DATE: 03/31/2017

SECTION: SE5 **TOWNSHIP:** 18S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

1150 HP LEAN BURN CATERPILLAR MODEL G3516TA LEAN-BURN LANDFILL GAS-FIRED IC ENGINE SERVED BY A 55 GALLON DRUM WITH ACTIVATED CARBON (SHARED WITH PERMIT UNIT S-2890-2) USED AS A CRANKCASE EMISSIONS CONTROL DEVICE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Engine shall be equipped with a turbocharger. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Engine shall be equipped with an aftercooler or intercooler. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This engine shall be equipped with a nonresettable fuel meter. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Maintenance (I&M) plan submitted to the District. [District Rule 4702, 6.5.5] Federally Enforceable Through Title V Permit
11. IC engine shall burn landfill gas from landfill gas collection system S-2996-1 and a maximum of 25% natural gas for combustion stabilization. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Landfill gas H₂S content shall not exceed 75 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emission rates shall not exceed any of the following: PM₁₀: 0.19 lb/hr; NO_x: 1.029 g/hp-hr or 65 ppmv @ 15% O₂; VOC: 0.55 g/hp-hr or 750 ppmv @ 15% O₂; or CO: 3.07 g/hp-hr or 2000 ppmv @ 15% O₂. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: MM TULARE ENERGY, LLC

Location: VISALIA LANDFILL, 32982 ROAD 80, VISALIA, CA 93281

S-2890-1-9, Aug 13 2015 5:05PM -- KLEVANND

14. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
15. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702] Federally Enforceable Through Title V Permit
16. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702] Federally Enforceable Through Title V Permit
18. NO_x, CO, and VOC emissions shall be measured (source tested) not less than once every 24 months. [District Rule 4701] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081 and 4701] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.8] Federally Enforceable Through Title V Permit
23. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, type of fuel burned and any other information necessary to demonstrate compliance. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 6.2.2] Federally Enforceable Through Title V Permit
25. NEO Tulare Energy LLC/Tulare County must maintain Permit to Operate S-2996-1-0 for the landfill gas collection system and meet all applicable Rule 4642 requirements. [District Rule 2080] Federally Enforceable Through Title V Permit
26. The owner/operator shall submit an Authority to Construct (ATC) permit application to the District to comply with requirements of 40 CFR 63 Subpart ZZZZ in timely manner so that upon startup the engine shall be in full compliance with requirements of 40 CFR Part 63, Subpart ZZZZ by October 19, 2013. [District Rule 2010 and 40 CFR 63.6585 & 63.6595(a)] Federally Enforceable Through Title V Permit
27. Landfill gas combusted in the engine shall be tested for H₂S content on a quarterly basis using draeger tubes. If compliance is shown for two consecutive quarters, the testing frequency may be changed to annual. Quarterly testing shall resume if any annual test shows noncompliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2890-2-9

EXPIRATION DATE: 03/31/2017

SECTION: SE 5 **TOWNSHIP:** 18S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

1150 HP LEAN BURN CATERPILLAR MODEL G3516TA LEAN-BURN LANDFILL GAS-FIRED IC ENGINE SERVED BY A 55 GALLON DRUM WITH ACTIVATED CARBON (SHARED WITH PERMIT UNIT S-2890-1) USED AS A CRANKCASE EMISSIONS CONTROL DEVICE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
2. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
3. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Engine shall be equipped with a turbocharger. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Engine shall be equipped with an aftercooler or intercooler. [District Rule 2201] Federally Enforceable Through Title V Permit
9. This engine shall be equipped with a nonresettable fuel meter. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Maintenance (I&M) plan submitted to the District. [District Rule 4702, 6.5.5] Federally Enforceable Through Title V Permit
11. IC engine shall burn landfill gas from landfill gas collection system S-2996-1 and a maximum of 25% natural gas for combustion stabilization. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Landfill gas H₂S content shall not exceed 75 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emission rates shall not exceed any of the following: PM₁₀: 0.19 lb/hr; NO_x: 1.029 g/hp-hr or 65 ppmv @ 15% O₂; VOC: 0.55 g/hp-hr or 750 ppmv @ 15% O₂; or CO: 3.07 g/hp-hr or 2000 ppmv @ 15% O₂. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
15. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702] Federally Enforceable Through Title V Permit
16. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702] Federally Enforceable Through Title V Permit
18. NO_x, CO, and VOC emissions shall be measured (source tested) not less than once every 24 months. [District Rule 4701] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081 and 4701] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.8] Federally Enforceable Through Title V Permit
23. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, type of fuel burned and any other information necessary to demonstrate compliance. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 6.2.2] Federally Enforceable Through Title V Permit
25. NEO Tulare Energy LLC/Tulare County must maintain Permit to Operate S-2996-1-0 for the landfill gas collection system and meet all applicable Rule 4642 requirements. [District Rule 2080] Federally Enforceable Through Title V Permit
26. The owner/operator shall submit an Authority to Construct (ATC) permit application to the District to comply with requirements of 40 CFR 63 Subpart ZZZZ in timely manner so that upon startup the engine shall be in full compliance with requirements of 40 CFR Part 63, Subpart ZZZZ by October 19, 2013. [District Rule 2010 and 40 CFR 63.6585 & 63.6595(a)] Federally Enforceable Through Title V Permit
27. Landfill gas combusted in the engine shall be tested for H₂S content on a quarterly basis using draeger tubes. If compliance is shown for two consecutive quarters, the testing frequency may be changed to annual. Quarterly testing shall resume if any annual test shows noncompliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B
Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2890-1-7

EXPIRATION DATE: 03/31/2017

SECTION: SE5 **TOWNSHIP:** 18S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

COMPLIANT DORMANT 1150 HP LEAN BURN CATERPILLAR MODEL G3516TA LEAN-BURN LANDFILL GAS-FIRED IC ENGINE SERVED BY A 55 GALLON DRUM WITH ACTIVATED CARBON (SHARED WITH PERMIT UNIT S-2890-2) USED AS A CRANKCASE EMISSIONS CONTROL DEVICE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
7. Engine shall be equipped with a turbocharger. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Engine shall be equipped with an aftercooler or intercooler. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This engine shall be equipped with a nonresettable fuel meter. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
11. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Maintenance (I&M) plan submitted to the District. [District Rule 4702, 6.5.5] Federally Enforceable Through Title V Permit
12. IC engine shall burn landfill gas from landfill gas collection system S-2996-1 and a maximum of 25% natural gas for combustion stabilization. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Landfill gas H₂S content shall not exceed 75 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

14. IC engine VOC destruction/treatment efficiency shall be at least 98% by weight or reduce the VOC concentration to 20 ppmv or less (as methane) @ 3% O₂. [District Rule 4642] Federally Enforceable Through Title V Permit
15. Emission rates shall not exceed any of the following: PM₁₀: 0.19 lb/hr; NO_x: 1.029 g/hp-hr or 65 ppmv @ 15% O₂; VOC: 0.55 g/hp-hr or 750 ppmv @ 15% O₂; or CO: 3.07 g/hp-hr or 2000 ppmv @ 15% O₂. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
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18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702] Federally Enforceable Through Title V Permit
20. NO_x, CO, and VOC emissions shall be measured (source tested) not less than once every 24 months. [District Rule 4701] Federally Enforceable Through Title V Permit
21. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081 and 4701] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.8] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

25. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, type of fuel burned and any other information necessary to demonstrate compliance. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702, 6.2.2] Federally Enforceable Through Title V Permit
27. NEO Tulare Energy LLC/Tulare County must maintain Permit to Operate S-2996-1-0 for the landfill gas collection system and meet all applicable Rule 4642 requirements. [District Rule 2080] Federally Enforceable Through Title V Permit
28. The owner/operator shall submit an Authority to Construct (ATC) permit application to the District to comply with requirements of 40 CFR 63 Subpart ZZZZ in timely manner so that upon startup the engine shall be in full compliance with requirements of 40 CFR Part 63, Subpart ZZZZ by October 19, 2013. [District Rule 2010 and 40 CFR 63.6585 & 63.6595(a)] Federally Enforceable Through Title V Permit
29. Landfill gas combusted in the engine shall be tested for H₂S content on a quarterly basis using draeger tubes. If compliance is shown for two consecutive quarters, the testing frequency may be changed to annual. Quarterly testing shall resume if any annual test shows noncompliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2890-2-7

EXPIRATION DATE: 03/31/2017

SECTION: SE 5 **TOWNSHIP:** 18S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

COMPLIANT DORMANT 1150 HP LEAN BURN CATERPILLAR MODEL G3516TA LEAN-BURN LANDFILL GAS-FIRED IC ENGINE SERVED BY A 55 GALLON DRUM WITH ACTIVATED CARBON (SHARED WITH PERMIT UNIT S-2890-1) USED AS A CRANKCASE EMISSIONS CONTROL DEVICE POWERING AN ELECTRICAL GENERATOR

PERMIT UNIT REQUIREMENTS

1. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
7. Engine shall be equipped with a turbocharger. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Engine shall be equipped with an aftercooler or intercooler. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This engine shall be equipped with a nonresettable fuel meter. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
11. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Maintenance (I&M) plan submitted to the District. [District Rule 4702, 6.5.5] Federally Enforceable Through Title V Permit
12. IC engine shall burn landfill gas from landfill gas collection system S-2996-1 and a maximum of 25% natural gas for combustion stabilization. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Landfill gas H₂S content shall not exceed 75 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

14. IC engine VOC destruction/treatment efficiency shall be at least 98% by weight or reduce the VOC concentration to 20 ppmv or less (as methane) @ 3% O₂. [District Rule 4642] Federally Enforceable Through Title V Permit
15. Emission rates shall not exceed any of the following: PM₁₀: 0.19 lb/hr; NO_x: 1.029 g/hp-hr or 65 ppmv @ 15% O₂; VOC: 0.55 g/hp-hr or 750 ppmv @ 15% O₂; or CO: 3.07 g/hp-hr or 2000 ppmv @ 15% O₂. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702] Federally Enforceable Through Title V Permit
17. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702] Federally Enforceable Through Title V Permit
18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702] Federally Enforceable Through Title V Permit
20. NO_x, CO, and VOC emissions shall be measured (source tested) not less than once every 24 months. [District Rule 4701] Federally Enforceable Through Title V Permit
21. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081 and 4701] Federally Enforceable Through Title V Permit
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These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT C

Application



San Joaquin Valley Air Pollution Control District


www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

RECEIVED
JUN 30 2015
SJVAPCD
Southern Region

1. PERMIT TO BE ISSUED TO: MM Tulare LLC - Facility ID #2890	
2. MAILING ADDRESS: STREET/P.O. BOX: 5087 Junction Road CITY: Lockport STATE: New York 9-DIGIT ZIP CODE: 14094	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 32982 Road 80 CITY: Visalia, CA 93291 1/4 SECTION TOWNSHIP RANGE	INSTALLATION DATE: N/A
4. GENERAL NATURE OF BUSINESS: Landfill gas collection and enclosed flare system	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) . <ul style="list-style-type: none">- Removal of Condition No. 14 of Permit No. S-2890-1-7- Removal of Condition No. 14 of Permit No. S-2890-2-7	
6. TYPE OR PRINT NAME OF APPLICANT: Anthony Falbo	TITLE OF APPLICANT: Senior Vice President - Operations
7. SIGNATURE OF APPLICANT: 	DATE: 6-25-15 PHONE: (716) 439-1004 FAX: (716) 439-0135 EMAIL: afalbo@fortistar.com

For APCD Use Only:

FORTISTAR METHANE GROUP LLC

DATE STAMP	FILING FEE RECEIVED: \$ 71 - CHECK#: 106923 DATE PAID: 6/30 / S-1153056, S-2890
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FORTISTAR Methane Group

MM Tulare Energy LLC
32982 Road 80 ♦ Visalia, California 93291
Tel. (559) 651-0388 ♦ Fax. (559) 651-3463

RECEIVED
JUN 30 2015
SJVAPCD
Southern Region

June 23, 2015

Dan Klevann
San Joaquin Valley Unified
Air Pollution Control District
34946 Flyover Court
Bakersfield CA 93308
United States

Subject: Administrative Change to Title V Permit
MM Tulare Energy LLC.; Facility No. S-2890

Dear Mr. Klevann:

MM Tulare Energy LLC is requesting an administrative modification of Permit No. xxx as follows:

- Removal of Condition No. 14 of Permit No. S-2890-1-7
- Removal of Condition No. 14 of Permit No. S-2890-2-7

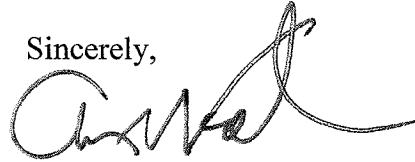
Both these conditions are identical and require demonstration of a VOC destruction efficiency of at least 98 percent by weight, or reduction of the VOC concentration to 20 ppmv or less as methane corrected to 3 percent oxygen. The conditions reference San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 4642 as the source of this requirement.

As discussed with you at a recent meeting, MM Tulare Energy LLC. notes that Rule 4642 does not apply to landfills that are subject to Section WWW of the New Source Performance Standards. Section 4.1.2 states "The requirements of this rule shall not apply to: Any solid waste disposal site which is subject to the requirements of 40 CFR 60 Subpart WWW (Standards of Performance for Municipal Solid Waste Landfills), or Subpart Cc (Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills)." NSPS WWW applies to landfills that have been in operation after May 30, 1991 and have a in place design capacity that exceeds 2.5 million megagrams. Please note that the Tulare County landfill began operation in 1972 and remains operational at this time. Further, the Cal Recycle database shows that this landfill accepts approximately 80,000 tons per year of refuse and has an in-place waste total of 4.7 MM Tons or 4.6 million megagrams. Thus, clearly the landfill is subject to NSPS WWW and therefore exempt from conditions related to Rule 4642.

Dan Klevann
SJVAPCD
Administrative Change to Title V for S-2890
Page 2

Please use the attached application to remove the aforementioned conditions from Permits s-2890-1-7 and S-2890-2-7. Please direct any questions regarding this permit application to Suparna Chakladar at (951) 833-4153.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony J. Falbo', with a stylized flourish at the end.

Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
MM Tulare Energy LLC

Enclosure

cc. Suparna Chakladar, FMG

ATTACHMENT D

Compliance Certification Form



San Joaquin Valley
Unified Air Pollution Control District

RECEIVED
JUN 30 2015
SJVAPCD
Southern Region



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

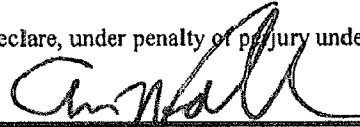
- ☐ SIGNIFICANT PERMIT MODIFICATION ☒ ADMINISTRATIVE
☐ MINOR PERMIT MODIFICATION ☐ AMENDMENT

COMPANY NAME:	FACILITY ID: S-2890
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: MM Tulare Energy LLC	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- GMF
GMF
GMF
GMF
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
 - ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
 - ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
 - ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

6-25-15
Date

ANTHONY L. EALBO
Name of Responsible Official (please print)

Senior Vice President - Operations
Title of Responsible Official (please print)